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BEFORE THE
FEDERAL AVIATION ADMINISTRATION
WASHINGTON, D. C.

DEPT. OF TRANSPORTATION
DOCKETS

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NOTICE OF ALTERNATIVE POLICY OPTIONS FOR :
MANAGING CAPACITY AT LAGUARDIA AIRPORT :
AND PROPOSED EXTENSION OF THE LOTTERY :
ALLOCATION :

FAA Docket
2001-9852 -9

COMMENTS OF AMERICAN AIRLINES, INC., TWA
AIRLINES LLC, AND AMERICAN EAGLE AIRLINES, INC.
SUPPORTING PROPOSED EXTENSION OF LOTTERY ALLOCATION

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July 12, 2001

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FEDERAL AVIATION ADMINISTRATION
WASHINGTON, D. C.

NOTICE OF ALTERNATIVE POLICY OPTIONS FOR :
MANAGING CAPACITY AT LAGUARDIA AIRPORT : FAA Docket
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AIRLINES LLC, AND AMERICAN EAGLE AIRLINES, INC.
SUPPORTING PROPOSED EXTENSION OF LOTTERY ALLOCATION

American Airlines, Inc., TWA Airlines LLC, and
American Eagle Airlines, Inc. hereby comment in support of the
FAA's proposal in Phase One of the captioned proceeding, 66
Fed. Reg. 31731, June 12, 2001, which would extend the existing
lottery allocation at LaGuardia Airport and hold an additional
lottery to reallocate unused capacity.

As the FAA has proposed, the allocation of LGA slots
to new entrant carriers and to incumbent carriers for service
to small communities, held on December 4, 2000, would be
extended through October 26, 2002. Moreover, an additional
lottery would be held to reallocate 14 LGA slots that were
unused from the initial lottery. In the additional lottery,
one round would be reserved for new entrant carriers, after
which any remaining slot times would be made available to
carriers providing service to small hub or non-hub airports,

in accordance with the established rank order from the December 4, 2000 lottery.

American, TWA Airlines LLC, and American Eagle concur that the initial lottery allocation should be extended, but we believe that the extension should be for an indefinite term, rather than through October 26, 2002. A longer-term solution at LaGuardia is not likely to be in place by the date the FAA has proposed, and accordingly the lottery extension should be open-ended. In the lottery held on December 4, 2000, American Eagle received LGA slots that it is using to serve small communities such as Bangor, Greensboro, Norfolk, Northwest Arkansas, Portland (ME), and Richmond. Absent an extension of the initial allocation, which would otherwise expire on September 15, 2001, there would be unwarranted disruptions for passengers and communities that have benefitted from new service.

It is clearly in the public interest for the initial allocation to continue, and for unused slots to be reallocated, pending the implementation of a longer-term solution with respect to capacity at LaGuardia (Phase Two). We will separately submit comments on Phase Two when such comments are due.¹

¹Phase Two comments are currently due on August 12, 2001. On June 21, 2001, the Air Transport Association requested an extension of 180 days.

Respectfully submitted,

A handwritten signature in cursive script, reading "Carl B. Nelson Jr". The signature is written in black ink and is positioned above a horizontal line.

CARL B. NELSON, JR.
Associate General Counsel
American Airlines, Inc.

July 12, 2001